

Docket No. 98N-0359 Sept. 1, 1999 FR 47845-47846
FDA Center for Food Safety and Applied Nutrition – Request for Comments

8352 '99 SEP 30 11:00

The following is respectfully submitted as recommended priorities for CFSAN in the year 2000:

Priority Item: Compliance Verification of Handwashing Regimen for Food Workers'

Despite the ongoing negative press regarding poor hand washing practices in food service, there is little progress in achieving a truly measurable regimen. Gloves give a false sense of security and lead to more cross contamination. The continued occurrence of foodborne illness cases emphasize the importance of hand washing in protecting the public health. With over 5,000 deaths in 79 million cases of foodborne illness per year as estimated by the US Centers for Disease Control (CDC), and the estimated 30-40% attributed to poor hand hygiene, the significance becomes clear – sick people, higher health care costs, lost revenue and productivity, absenteeism, higher insurance costs, and a lack of public confidence – all contributing to the significance of this issue and the basis for priority treatment.

According to the US Centers for Disease Control, "Hand washing is the single most important means of preventing the spread of infection." Numerous studies indicate that hand washing is too often neglected and improperly performed in foodservice operations. No hand-contact rules suggest that gloves and serving utensils are effective barriers to contaminants carried on the hands. Conversely, studies (BioScience Laboratories, Bozeman, MT) indicate that 80% of randomly selected vinyl food grade gloves had pre-existing punctures and tears. In addition, gloves provide a favorable environment (moisture, warmth) for reproduction of microorganisms. Finally, gloves tend to give a false sense of security resulting in decreased vigilance and are as likely to carry contaminants as are hands unless changed frequently and unless an effective hand wash is performed each time.

Effective control of food worker hygiene is a Critical Control Point under the 1999 FDA Food Code. Under HACCP principles, CCP must include monitoring, record-keeping, and verification procedures, yet in the area of food worker hand washing, passive observation by management has proven to be ineffective. Effective methods of compliance measurement, hand-washing management, continuous monitoring, record-keeping, and validation/verification are required, whether they be through the use of equipment, electronics, or other existing or emerging technologies. Such systems are the only proven means of improving compliance rates, changing attitudes that range from indifference to outright neglect, modifying poor hygiene habits, and providing performance based motivation.

Finally, guidance should be provided on acceptable and reasonable levels of compliance with prescribed hand-washing expectations according to frequency (eg. – once per hour) as they are currently provided in areas of duration (eg. – 20 seconds) and water temperature by the FDA Food Code.

Submitted by: Noel B. Segal
Compliance Control Inc.
8012 Fernham Lane
Forestville, MD 20747
301-735-2207 FAX 301-735-0028
E-mail: comcontrol@aol.com
September 28, 1999

98N-0359

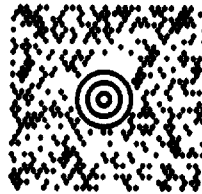
C 36

Call 1-800-PICK-UPS (1-800-742-5877) or visit our Web site at www.ups.com

bel.
gister tape above the address label.

COMPLIANCE CONTROL, INC.
(301)735-2207
8012 FERNHAM LANE
FORESTVILLE MD 20747-4519

SHIP TO: DOCKETS MANAGEMENT BRANCH (HFA-305)
FOOD AND DRUG ADMINISTRATION
DOCKETS MANAGEMENT (HFA-305)
ROOM 1061
5630 FISHERS LANE
ROCKVILLE MD 20852



MD 2070-10



UPS NEXT DAY AIR

TRACKING #: 1Z X06 2W4 01 80 170



INVOICE #: DOCKET#98N-0359

B/SS

PRO 6.0.1818 E2042



International Shipping Notice: Cargo hereunder may be subject to the rules relating to liability and other terms and/or conditions established by the Convention for the Unification of Certain Rules Relating to International Carriage by Air (the "Warsaw Convention") and/or the Convention on the Contract for the International Carriage of Goods by Road (the "CMR Convention"). These commodities, technology or software were exported from the U.S. in accordance with the Export Administration Regulations. Diversion contrary to U.S. law prohibited. For recycling please call 1-800-782-7692. United Parcel Service of America, Inc. © 2002